



**Department of Law**  
*Monroe County, New York*

**Adam J. Bello**  
*County Executive*

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*County Attorney*

November 5, 2021

*By ECF*

Hon. Frank P. Geraci, Jr., U.S.D.J.  
Kenneth B. Keating Federal Building  
100 State Street  
Rochester, NY 14614

***Re: Anthony Hall, et al. v. Lovely Ann Warren, et al., Case No. 21-cv-6296***

Dear Judge Geraci:

I write on behalf of my clients, defendants Todd Baxter, Monroe County, the Monroe County Sheriff's Office, and "Richard Roe" Monroe County Sheriff's Deputies (together, the "County Defendants"), to respectfully request leave, pursuant to Local Rule 7(a)(2)(C), to file an enlarged memorandum of law in support of the anticipated County Defendants' Motion to dismiss the Amended Complaint that is due to be filed on or before November 11, 2021.

The Amended Complaint in this action, brought on behalf of 10 individuals and two organizations as plaintiffs, alleges multiple separate constitutional violations against the County Defendants. The Complaint also sets forth allegations in support of class certification.

The County Defendants expect to submit a memorandum of law in support of their Motion that is approximately 30 pages. Accordingly, the County Defendants are respectfully requesting that the Court grant leave for such an enlarged memorandum.

Respectfully yours,

***Maria E. Rodi***

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cc: All counsel of record, *via ECF*

